



1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19899-0951  
302 984 6000  
[www.potteranderson.com](http://www.potteranderson.com)

**Bindu A. Palapura**

Attorney at Law

[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
302 984-6092 Direct Phone  
302 658-1192 Fax

October 10, 2017

**VIA ELECTRONIC FILING**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, DE 19801-3556

Re: *International Business Machines Corporation v. Groupon, Inc.*,  
C.A. No. 16-122-LPS

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Dear Chief Judge Stark:

Pursuant to the Court's Patent Procedures, the parties jointly request the scheduling of a teleconference to address IBM's Motion to Strike Groupon Inc.'s Late-Disclosed Invalidity Theories (D.I. 172 (motion); *see also* D.I. 173 (supporting letter), D.I. 176 (Defendant's response), D.I. 178 (IBM's reply)).

IBM respectfully requests a hearing at the Court's earliest convenience to determine whether it will be necessary to address Groupon's new invalidity references in advance of the November 3, 2017 deadline to file IBM's expert report on validity.

Respectfully,

*/s/ Bindu A. Palapura*

Bindu A. Palapura

BAP/sjh/5441948/43155

cc: Clerk of the Court (via hand delivery)  
Counsel of Record (via electronic mail)